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June 19, 2020

**VIA ECF**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

**Re: *DJ Direct, Inc. v. OMM Imports, Inc. d/b/a/ Zero Gravity, et al.***  
**Civil Action No.: 1:19-cv-02541 (MKB) (VMS)**

Dear Judge Scanlon:

This firm represents Plaintiff DJ Direct, Inc. in the above matter. We submit this letter jointly with counsel for Defendants OMM Imports, Inc. ("OMM"), Brea's Cosmetic Corp. and David Zur (collectively "Defendants") to report on the status of the case, per Your Honor's Order of May 19, 2020.

The parties are still moving toward settlement of this complicated dispute. Further to that end, the parties have been actively negotiating and finalizing a proposed Distribution Agreement, in conjunction with preparing a formal Settlement Agreement and Consent Judgment. The Distribution Agreement is complex and the terms of the agreement have been affected by the COVID pandemic. Furthermore, one of Defendants' counsels has been hospitalized due to COVID. These unexpected complications have delayed settlement.

There are no outstanding discovery disputes. Defendant OMM is due to file a response to the Complaint, but the parties hope that it will not be necessary.

In order to give the parties sufficient time to finalize what is a very complicated settlement and distributorship agreement, the parties respectfully request an additional forty-five days (45) day stay of discovery to finalize the terms of the settlement and distribution agreements.

Respectfully submitted,

**STERN & SCHURIN, LLP**

*Steven Stern*

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